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USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 8/8/2024

August 7, 2024

Honorable Valerie Caproni, U.S.D.J.  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

**Re: *Hernandez v. Merlin Entertainments Group, et al.*, No. 1:24-cv-04450  
Joint Letter Seeking Adjournment of the Initial Pretrial Conference and Extension  
of Deadline to Respond to the Complaint**

Your Honor:

The parties jointly submit this letter-motion pursuant to sections 2.C and 3.A of Your Honor's individual practices to request an adjournment of the Initial Pretrial Conference ("IPTC") and an extension of Defendants Merlin Entertainments Group U.S. Holdings Inc. and Madame Tussauds New York, LLCs' deadline to respond to the complaint.

The IPTC is currently scheduled for August 16, 2024. ECF No. 5. The reason for the proposed adjournment is that the parties are currently exploring a resolution of this action and are engaging in certain confidential document production to facilitate the possible resolution of this matter. The parties have not previously sought an adjournment or extension of time and all parties consent to the request. The parties propose September 27, 2024 or October 4, 2024 as alternative dates to hold the IPTC, and the parties will advise the Court as soon as possible and at least 48 business hours prior to the [proposed] rescheduled IPTC should the parties come to a resolution of this action.

Defendants' deadline to respond to the complaint is currently August 26, 2024. Due to the same reasons, the parties jointly seek to extend this deadline to the date the Court selects for the adjourned IPTC. This deadline has not previously been extended.

We thank the Court for its attention to this matter and will make ourselves available at the Court's convenience should it have any questions.

The Honorable Valerie Caproni  
August 7, 2024

Respectfully submitted,

/s/ Matthew M. Guiney

Matthew M. Guiney  
WOLF HALDSENTEIN

*Attorneys for Plaintiff*

/s/ Colleen Carey Gulliver

Colleen Carey Gulliver  
DLA PIPER LLP (US)

*Attorneys for Defendants*

cc: All counsel of record (by ECF)

Application GRANTED. The Initial Pretrial Conference scheduled for Friday, August 16, 2024, at 10:00 A.M. is ADJOURNED to **Friday, October 18, 2024, at 10:00 A.M.** The deadline for the parties to submit a joint proposed case management plan and joint letter containing the information described on page 2 of the Court's June 11, 2024, Order, *see* Dkt. 5, is extended from Thursday, August 8, 2024, to **Thursday, October 10, 2024**.

Defendants' deadline to answer or otherwise respond to the Complaint is extended from Monday, August 26, 2024, to **Friday, October 18, 2024**.

SO ORDERED.



8/8/2024

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE